

Commissioner for Patents
United States Patent Application No. 10/812,446

REMARKS

Reconsideration of this application is respectfully requested.

Claim Objections

Claims 1, 4 and 12 were objected to on formal grounds. Claims 1, 4 and 12 are amended, and the objections to claims 1, 4 and 12 are thereby traversed.

Claim Rejections – 35 U.S.C. § 112

Claims 24 and 25 were rejected under 35 U.S.C. § 112 as indefinite. Claims 24 and 25 are amended to correct typographical errors.

The rejection of claims 24 and 25 is thereby traversed.

Claim Rejections – 35 U.S.C. § 102

The Office Action rejected claims 1-5, 8-10 and 12 under 35 U.S.C. § 102(b) as being anticipated by Begg. Applicant traverses the rejection for at least the following reasons.

The Office Action equates Begg's "pipe coupling 15" (page 1, col. 1, lines 54-55), Begg's "bonnet 35" (page 2, col. 1, line 1) and Begg's "collar 54" (page 2, col. 1, line 26) with the claimed tubular heads, and Begg's "base member 13" and "upper member 14" (page 1, col. 1, lines 51-52), with the claimed mandrels supported by the tubular heads. Even if pipe coupling 15, bonnet 35 and collar 54 could correspond to the claimed tubular heads, Applicants note that Begg's base member 13, not bonnet 35, supports Begg's upper member 14 (Fig. 2). Thus, Begg does not disclose or teach a plurality of tubular heads, each tubular head supporting a mandrel.

Further, claim 1 recites that each mandrel is secured to the tubular head that supports it by a threaded union. Under the position taken by the Office Action that the Begg pipe coupling, bonnet and collar correspond to the claimed tubular heads and that the

Commissioner for Patents
United States Patent Application No. 10/812,446

Begg base and upper members 14 correspond to the claimed mandrels, there are no threaded unions securing the mandrels to the tubular heads.

The Office Action equates the “surface casing 10” with both “conductor assembly 10” and “surface casing 10.” It is well known in the art that the conductor assembly and the surface casing are distinct and separate entities. Applicant therefore traverses the rejection to this extent and respectfully requests clarification.

The Office Action asserts that Begg discloses “a tubing head spool, at openings 41, threadedly secured to the casing mandrel” and that the “casing mandrel” is Begg base member 13. Begg discloses at page 2, column 1, lines 7-9, however, that “Threaded in oppositely disposed openings 41 formed in the member 14 that communicate with recesses 42 formed in seat 38 are vent pipes 43.” Applicants submit that Begg does not disclose a tubing head spool threadedly secured to a casing mandrel at 41.

The Office Action equates Begg’s slips 18, 39 with the claimed tubing hanger and asserts that the tubing hanger 18, 39 is threadedly secured to the tubing head spool above numeral 38. However, Begg shows a gap at reference numeral 44 between the slips 39 and the gland 46, and it is clear that the slips 18, 39 are only secured to the tapered seats 16, 38 by gravity, in a manner well known in the art.

Claims 1, 2 and 8 are amended to distinguish specific structure to define the tubular heads and to further distinguish over Begg.

The rejection of claims 1-5, 8-10 and 12 is thereby traversed.

Allowable Subject Matter

Applicant gratefully acknowledges that claims 13-22 are allowed.

Applicant further gratefully acknowledges that claim 6, 7 and 23 would be allowable if rewritten in independent form. However, for reasons set forth above, it is


Commissioner for Patents
United States Patent Application No. 10/812,446

respectfully submitted that each of claims 1-12 and 24-25 are now in a condition for allowance.

This application is now considered to be in a condition for immediate allowance. Favorable reconsideration and early issuance of a Notice of Allowance are therefore requested.

Respectfully submitted,

NELSON MULLINS RILEY
& SCARBOROUGH, L.L.P.



Lloyd G. Farr
Registration No. 38,446

1320 Main Street
Columbia, SC 29201
(404) 817-6165
Fax (803) 255-9831